

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

CHRISTY L. WILLIAMS,
Plaintiff,

v.

TARRANT COUNTY COLLEGE DISTRICT,
Defendant

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Civil Action No. 4:15-cv-00241-O

**APPENDIX IN SUPPORT OF RESPONSE TO DEFENDANT'S
OBJECTIONS TO PLAINTIFF'S SUMMARY JUDGMENT EVIDENCE**

| Page(s) | Description |
|---------|---------------------------------------|
| 2 | Declaration of Donald E. Uloth |
| 3 | Exhibit A – Email to opposing counsel |
| 4-6 | Attachments to the email |

CERTIFICATE OF SERVICE

I certify that on October 5, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will transmit a Notice of Electronic Filing to all counsel for Defendant.

/s/ Donald E. Uloth
Donald E. Uloth

DECLARATION OF DONALD E. ULOTH

1. My name is Donald E. Uloth. I am over twenty-one (21) years of age and I am competent to make this Declaration. I have personal knowledge of the facts set forth herein, and they are all true and correct.

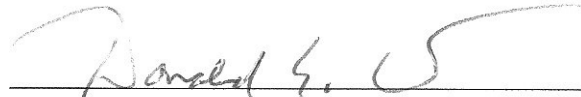
2. I am the attorney for Christy Williams in Case No. 4:15-cv-00241-O, Christy Williams v. Tarrant County College District, now pending in the United States District Court for the Northern District of Texas, Fort Worth Division.

3. On May 17, 2013, I sent an email to Lu Pham and Lauren McDonald, counsel for TCCD. I included three attachments to the email, which were the pages of the Writing Lab brochure I had received by email from Dr. Curtis Fukuchi. True and correct copies of my email, and the three attachments, are attached to my declaration as Exhibit A.

4. The three pages attached to my May 17, 2016 email are the only pages of the brochure that I received from Fukuchi. Neither Plaintiff or I have any additional pages to produce.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 5, 2016.


Donald E. Uloth

Don Uloth

From: Don Uloth <don.uloth@uloth.pro>
Sent: Tuesday, May 17, 2016 4:24 PM
To: 'Lu Pham'; 'Lauren McDonald'
Subject: Williams v TCCD: brochure, and Bates numbers of pages representing native file format documents
Attachments: IMG_0419.jpg; IMG_0420.jpg; IMG_0421.jpg

Lu and Lauren:

As we just discussed, attached are three .jpg files – pictures of a writing lab policy. This and any variations thereof would be responsive one of Plaintiff's requests for production and I'm hoping you can track down better-quality copies.

Also, here are a few sample Bates numbers of pages where TCCD indicated it would be producing a native file format document (I think all of these are Excel spreadsheets): TCCD 608-609, 671, 674-676, and 916. There are many other pages as well but I am hoping you can get these and all of the others and get those to me. Please don't try to redact – the names of students is relevant and we have a protective order allowing you to designate as confidential.

Thanks.

Don Uloth

Donald E. Uloth
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WRITING LAB

Tarrant County College
Northwest Campus
Writing Lab
WCTS 1151
(817) 515-7147

Welcome to Tarrant County College Northwest Campus Writing Lab!

The goal of the Writing Lab is to promote students' endeavors in grammar, style, and creativity. We can help you improve your writing by explaining the skills needed to become confident and self-sufficient writers.

Please keep in mind, however, that we cannot edit, proofread, correct, or fix your assignment because that would violate TCC's academic honesty policy. **Your goal in visiting the Writing Lab should be to become a more skilled writer, not to get a good grade or extra credit on a particular assignment. Success takes sustained effort and practice!**

Writing tutors will make a return appointment when you submit your essay. Students should plan their drafts accordingly, properly allotting time for the writing process.

We suggest that you make an appointment with a tutor after completing some form of an outline or rough draft. Writing is a multi-step process that requires several drafts, so visit a tutor early in the assignment. This is a free service, and is first come -first served. **Please plan your time well!**

Please Note: Tutors are not available to review drafts for the first time within the 24 hours prior to the assignment's due date/time.

MAKING AN APPOINTMENT



Before making an appointment with a writing tutor, please follow these procedures:

1. **Run a spelling & grammar check on your paper. Essays must be typed for review.**
2. **Proofread your paper** and make any changes that the above checks failed to flag. **The tutors cannot proofread your paper for you.**
3. **Print your paper** to present to a tutor.
4. **To make an appointment:**

Drop off your paper with any tutor **more than 24 hours before your paper or project is due.** The tutor will reserve an assigned time for your appointment. Come to your tutorial prepared to discuss your essay, ideas, or questions.